



September 16, 1991

Reply to
Attn of: HW-113

Dean Fowler, Project Manager
Utility Division
Spokane County Public Works
N. 811 Jefferson Street
Spokane, Washington 99260-0180

Re: Domestic Well Monitoring Program, Management Plan

Dear Mr. Fowler;

The U.S. Environmental Protection Agency (EPA) has reviewed the "Colbert Landfill Domestic Well Sampling Program, Management Plan" (Management Plan), sent on August 7, 1991 by Mr. Wedlake. We have discussed this document with the Washington Department of Ecology (Ecology) and have come to similar conclusions. The draft plan does not have sufficient detail about the organization and responsibilities to allow this plan to be implemented in its present form. Your approach to developing the Management Plan appears to have the proper intent and is a start, but it is not complete.

Generally a management plan is written to address an approach for a solution to a particular problem. This Management Plan doesn't clearly define the reason for the well monitoring program and what the program is intended to do.

A management plan has to be complete enough to describe the current or proposed processes that are in-place, or required, to implement the program to solve the identified problem. Who is responsible for the implementation of the program? What are the responsibilities of those key people that run the program? Who makes policy, and who can suggest changes?

The Management Plan needs some management objectives much like those in the "Project Objectives" for the technical issues. Some of the objectives might include:

- Identify the County's responsibility to implement.
- What office in the County handles this program; which positions and what are their roles?
- Role of the Sampling Committee (management).
- The decision process within the management.
- Communication with the program and public.

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The Management Plan with its attached documents has to present the complete picture of the program. It has to be complete enough to present the DWMP and how it is being implemented to anyone who reads the plan. Those of us close to the program tend to assume anyone who reviews the program has a similar background; this is not always the case.

For example; the history of the program could be expanded to provide some more detail on the evolution and the development of this Management Plan. The sampling of the groundwater wells did not just happen. The need was identified and decisions were made to create the sampling program. EPA determined that the Domestic Well Monitoring Program (DWMP) that was created during the RIFS phase of the project was important enough to include it into the consent decree. Our reason for including this program was two-fold at that time: first, the DWMP provided information about the drinking water, in-use, by residents that obtained their drinking water from an aquifer which was known to have contamination. Secondly, the DWMP provided water quality data which could be utilized during the evaluation of the nature and extent of contamination done during the FS.

As the process evolved, a Sampling Committee was established. The consent decree further evolved the process because it made Spokane County solely responsible for implementing the program then defined as the DWMP. Then in 1989 when a sampling problem was identified, the county used a process to evaluate the problem and provide a solution.

Ecology sent some additional comments which are similar to those above. It is recommended that the draft Management Plan that was sent to us be revised to present a more complete analysis of the program; its reason for being, how it is implemented, and some discussion of the responsibilities of those positions responsible.

If you have any questions about either the EPA or the Ecology comments (sent separately), please contact either Mike Kuntz, at Ecology (206-438-3079), or me (206-553-7177).

Sincerely,



Neil E. Thompson
Project Manager

cc: Kuntz, Ecology